

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	
v.	:	CRIMINAL NO. 22-142
LAYE SEKOU CAMARA	:	
a/k/a “K-1”	:	
a/k/a “Dragon Master”	:	

GOVERNMENT’S EIGHTH MONTHLY STATUS REPORT

The United States of America, through its attorneys, Jacqueline C. Romero, United States Attorney for the Eastern District of Pennsylvania, and Linwood C. Wright, Jr. and Kelly M. Harrell, Assistant United States Attorneys for the district, and Chelsea Schinnour, Trial Attorney, United States Department of Justice, pursuant to this Court’s October 3, 2023 order, respectfully submits its eighth monthly status report as follows:

1. In an effort to assure that the government fulfills its ongoing discovery obligations, the government submitted relevant information on its foreign witnesses to Department of Justice officials for them to submit these witnesses’ identifiers to relevant intelligence agencies to determine what, if any, information about these witnesses is in the possession these agencies. The agencies have completed gathering possibly responsive information, and the government has completed its review of this information. On June 4, 2024, the government refiled its Motion for a Pretrial Conference Pursuant to the Classified Information Procedures Act (CIPA). As noted in that filing the government proposes a bifurcated *in camera* Section 2 conference in this case. Ultimately, pursuant to Section 4 of CIPA, the government anticipates filing appropriate brief(s) addressing the propriety of deleting, substituting, or disclosing classified information, if any, relating to this prosecution. Because of

the nature of the information, if it exists, it is required that the government prepare its filings over systems to which its access is currently restricted. The government has taken concrete steps to gain access to these systems and anticipates that this access will be granted in relatively short order. That said, unfortunately the government does not control the timing of its access to these necessary systems. Once this access is granted the government anticipates providing the Court with filings that will aid the Court in resolving any CIPA related issues.

2. Because of the nature of this prosecution, generating the reports of investigation based on the interviews of primarily foreign witnesses has proven arduous. The government is working diligently to assure that these reports are generated. The government is hopeful that these reports will be generated, finalized, and produced to the defendant as soon as practicable.

Respectfully submitted,

JACQUELINE C. ROMERO
United States Attorney

/s/ Linwood C. Wright, Jr.
LINWOOD C. WRIGHT, JR.
KELLY M. HARRELL
Assistant United States Attorneys

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Government's Eighth Monthly Status Report, was filed electronically on the Electronic Case Filing system, is available for viewing and downloading from the ECF system, and/or was served electronically on the following:

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DATED: June 21, 2024